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REMARKS

Claim 14 has been amended to correct a minor typographical error.

It is noted that the references cited on two Information Disclosure Statements filed on January 18, 2007 have not been considered by the Examiner. Consideration of these references is respectfully requested. Replacement copies of the PTO-1449 forms are enclosed for the convenience of the Examiner.

The courtesy of the Examiner in granting the undersigned attorney, Richard S. MacMillan, and Forrest P. Gauthier a personal interview on June 20, 2007 is gratefully acknowledged. During that interview, the claimed invention was discussed in detail, and it was described how the prior art of record does not teach the claimed invention as recited by the independent claims.

Claim 1 defines the invention as a computer implemented method for generating a bitmap suitable for high-speed variable printing including the step of providing a page description language file defining at least one variable data area and at least one static data area. Independent Claims 12, 13, and 14 define the invention in a similar manner. None of the art of record shows or suggests this step.

Specifically, the McGilton et al. reference does not show or suggest the step of providing a page description language file defining at least one variable data area and at least one static data area. On the contrary, the McGilton et al. reference discloses a method of creating a page description language file that includes a static data area, but no variable data area whatsoever. On Page 465, the McGilton et al. reference states that the:

“primary benefit of forms is they’re cached. This same benefit leads to a slight disadvantage – PostScript forms cannot directly support filling in a form. The PostScript interpreter images forms at unpredictable times, and sometimes not at all – the interpreter copies the bits from a cache. You can’t rely on the environment in which the form is executed or even that the form will be executed. Therefore, you can’t image variable information directly in the form. You must write PostScript instructions directly in the form. You must write PostScript instructions outside the framework of the form dictionary to place variable information within the form” (emphasis added).

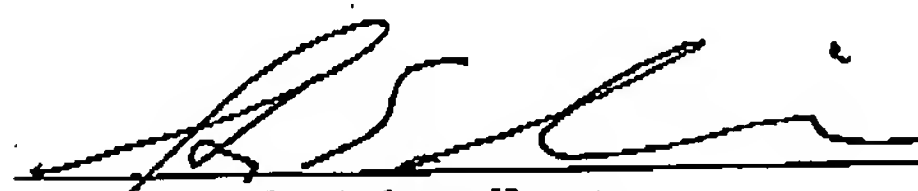
Thus, the McGilton et al. reference clearly generates a page description language file that includes a static data area, but no variable data area whatsoever.

As noted in the above quotation, the McGilton et al. reference contemplates that "variable" data may be written into the form. However, such variable data is not a "variable data area" within a page description language file, as specifically claimed, but rather is a piece of information that is hard coded into the page description language file. Thus, any time that a page having different information is desired to be generated using the method disclosed in the McGilton et al. reference, the page description language file must be changed and the entire new file must be read and processed in its entirety.

In the claimed method, on the other hand, the page description language file includes a variable data area, into which variable data can be inserted. Thus, any time that a page having different information is desired to be generated using the claimed method, the page description language file is not changed at all, nor is it necessary for the entire new file to be read and processed in its entirety. Thus, the claimed method is quite different from the method disclosed in the McGilton et al. reference.

Claims 2 and 14 further recite the step of providing a merge file including a plurality of variable data items. The McGilton et al. reference does not show or suggest this step and, therefore, are also patentable for this reason.

Respectfully submitted,



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